Collinsville

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

April 26, 2000

CERTIFIED MAIL
P 344 306 067

Chemetco
Attn.: Kim Fock, Manager, Engineering and Maintenance
P.O. Box 67
Hartford, Illinois 62048

RECEIVED
IEPA
APR 27 2000
COLLINSVILLE OFFICE

Re: 1198010003 -- Madison County
Chemetco, Inc.
ILD048843809
Date Received: January 31, 2000
Log #C-785-M-1
RCRA-Closure

Dear Mr. Fock:

The closure plan modification request, dated January 31, 2000, submitted by CSD Environmental Services on your behalf has been reviewed by the Illinois EPA. Your partial plan to close the four (4) hazardous waste surface (S03) impoundments associated with the release of the zinc oxide is hereby approved subject to the following conditions and modifications:

1. Except as modified by this letter, closure activities shall be carried out in accordance with the Zinc Oxide Spill Remediation Plan Phase I - Material Removal and Partial Closure Revised March 2000.

2. Closure activities should be completed by December 15, 2000, unless superseded by a state or Federal consent order. In accordance with 35 Ill. Adm. Code 725.215, when closure is complete a certification must be submitted to Illinois EPA by the owner/operator and an independent professional engineer that the hazardous waste management units at the facility have been closed in accordance with the specifications in the approved closure plan. This certification should be received at the Illinois EPA within sixty (60) days after closure, or by February 15, 2001. These dates may be revised if the Illinois EPA finds that additional time is necessary to complete all required closure activities and Chemetco demonstrates to the Illinois EPA that it is attempting to complete closure in a timely manner.

   The attached closure certification form must be used. Signatures must meet the requirements of 35 Ill. Adm. Code 702.126. The independent engineer should be present at

all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity. Financial assurance must be maintained for the units approved for closure herein until the Illinois EPA approves the facility's closure certification.

The Professional Engineering Practice Act (225 Illinois Compiled Statutes 325/1-325/49) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be licensed under that act. Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with Paragraph 325/14 of the Professional Engineering Practice Act. Any service rendered as a professional geologist must also be provided in compliance with the Illinois Professional Geologist Licencing Act (225 ILCS 745/1 et. seq.).

As part of the closure certification, to document the closure activities at your facility in accordance with 35 Ill. Adm. Code 725.215, a Closure Documentation Report must be developed and submitted to Illinois EPA along with the closure certification statement which includes the following:

a. Background information about the facility overall and the overall closure project.

b. A description of the unit(s) closed (include scaled maps showing location of unit(s) within facility and layout of unit(s), information related to construction of the unit(s), identification of wastes managed in the unit(s)).

c. A general discussion of all completed closure activities and what was accomplished as a result of completing these activities.

d. The volume of waste, waste residue and contaminated soil (if any) removed. The term waste includes wastes resulting from decontamination activities.

e. Scaled drawings showing the horizontal and vertical boundaries of the extent of any soil removal effort.

f. A description of the method of waste handling and transport.

g. The waste manifest numbers.

h. Copies of the waste manifests.

i. Information documenting the results of all sampling/analysis efforts. The goal of presenting this information should be to describe, in a logical manner, the activities and results associated with the sampling/analysis effort. At a minimum, this information must include:

(1) identification of the reason for the sampling/analysis effort and the goals of the effort;

(2) a summary in tabular form of all analytical data, including all quality assurance/quality control data;

(3) a scaled drawing showing the horizontal location from which all soil samples were collected;

(4) identification of the depth and vertical interval from which each sample was collected;

(5) a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;

(6) identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical inferences;

(7) copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality assurance dates;

(8) visual classification of each soil sample in accordance with ASTM D-2488;

(9) a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and

(10) a discussion of the data, as it relates to the overall goal of the sampling/analysis effort.

j. Color photo documentation of closure. Document conditions before, during and after closure.

k. A chronological summary of closure activities and the cost involved.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Illinois EPA by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Land -- #33
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

3. Chemetco submitted revisions to the March 1998 Zinc Oxide Spill Remediation Plan. The revisions were meant to be inserted into the previously approved closure plan document, dated, March 1998 and approved June 10, 1998. Since the March 1998 closure plan was previously approved it cannot be revised with the additions of inserts to the original document. In the future a complete stand-alone document will be required, however references to the previous closure plans are acceptable.

4. The following procedure must be utilized in the collection of all required soil samples:

   a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.

   b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:

      1. the procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.

      2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;

   c. All soil samples which will be analyzed for volatile organic compounds must be collected in accordance with Attachment A of the Illinois EPA's RCRA closure plan instructions;

   d. All other soil samples must be collected in accordance with the procedures set forth in Test Methods for Evaluating Solid Wastes (SW-846), Third Edition and Finalized Updates;

   e. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually

discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.

5. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts.

6. All soil samples which will be used to demonstrate clean closure shall be analyzed individually (i.e., no composting). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes (SW-846), Third Edition and Finalized Updates. When a SW-846 analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Illinois EPA. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. If possible, your sampling program should be extensive enough to determine the lateral and vertical extent of contamination to the detection limit (PQLs) referenced above. All soil samples which will be used to demonstrate clean closure must be analyzed for:

- Antimony *
- Arsenic *
- Barium *
- Beryllium *
- Boron *
- Cadmium *
- Chloride
- Chromium *
- Cobalt *
- Copper *
- Fluoride *
- Iron *
- Lead *
- Mercury *
- Nickel *
- pH
- Selenium *
- Silver *
- Sulfate *
- Tin *
- Vanadium *
- Zinc *

* - TCLP and total analysis shall be run for these parameters.

7. The proposed soil remediation objectives, based upon 35 IAC Section 742 Appendix B, Table C, pH Specific Soil Remediation Objectives (Class I Groundwater) can not be approved at this time. 35 IAC Section 742.510(a)(5) prohibits the use of Table C if the pH of the soil is greater than 8.0. The cleanup objectives should be re-evaluated based upon the additional information gathered during the characterization of the site, i.e., the determination of the extent of the contamination.

8. The following are comments related to Chemetco's proposed Remedial Action Plan Permit (RAPP) (Section 5, Attachment 10, and 11 of the closure plan). Further evaluation of this information will be completed when the final RAPP application is received.

   a. The RAPP should be submitted as a separate document which references the approved closure plan.

   b. Chemetco should obtain any permits or modify any existing permits (land, water or air pollution permits) that would be required due to the actions associated with the closure of the units.

   c. Chemetco proposes to collect samples from the first and tenth load and 10% of the out going loads thereafter. At a minimum, the first 10 loads should be tested in order to establish an adequate statistical base to determine the sampling rate for the following loads. The method that will be used to make this statistical determination should be provided in the waste analysis plan.

      Chemetco must demonstrate with a high level of certainty that the all of the treated waste will meet the required 35 IAC 728 Land Disposal Restrictions (LDR) standards. A reduced testing schedule should be developed based upon the statistical information obtained from the initial testing of the treated wastestreams.

   d. Due to the unique nature of the contaminated debris (contaminated stumps, wood, and limestone rock) should be treated in separate batches from the zinc oxide/soil waste unless it has been demonstrated that the debris can be successfully treated with the zinc oxide/soil waste. The sampling scheme used to demonstrate that the debris meets the LDR standards should be similar to zinc oxide/soil waste alone.

   e. In accordance with 35 IAC 728.148, all samples obtained from the treated wastestreams that will be used to demonstrate compliance with the applicable LDR standards must be grab samples, and not composite samples. Due to the unique nature of the debris Chemetco should provide a detailed description of how the grab samples will be obtained from the treated debris.

f. At a minimum, waste from the first 10 loads of treated waste should not be sent off-site until the analytical results are returned and evaluated to ensure that the treated waste meets the required LDR standards.

g. Chemetco states that the treated wastestream will be analyzed for the parameters identified in Table 1 of Attachment 11 using SW-846 method 1311. The analytical procedure for cyanide (total and amenable) are based upon SW-846 method 9010 or 9012, not the TCLP method 1311.

9. Water from containment areas 1 and 2 may not be placed in the on-site storm water retention basin. Water from the other Containment Area 3 may be placed in the on-site storm water retention basin with the approval from the Bureau of Water Pollution Control.

10. Additional sampling must be performed until the extent of the contamination is determined.

11. Table 9.1 of the application indicates that the soil sampling will be completed from day 75 to 90, following the treatment of the zinc oxide. The Agency requests that the characterization of the extent of the contamination be conducted as soon as possible, as the completion of closure is dependent on this determination. See condition 15.

12. Chemetco is proposing to collect three (3) soil samples from the area south of the diversion channel. Although these samples will confirm that contamination is not present at those locations, it will not demonstrate that no contamination exist south of Containment Area 3 up to those locations. Therefore, it is recommended that the samples be moved to the southern berm of area 3. The soil samples should be collected from a depth of 6 and 18 inches as measured from the fill/natural soil interface.

13. Soil samples obtained from beneath berms must be obtained from a depth of 6 and 18 inches as measured from the fill/natural soil interface. Chemetco must also demonstrate that the soil, rock, etc. used to create the containment berms is not contaminated above the cleanup objectives.

14. Chemetco's proposal to allow sample locations RR-1, RR-2 & RR-3 to suffice for sampling in the area south of containment area 4 is not acceptable. The soil samples RR-1, RR-2 & RR-3 were not analyzed for all of the required analytical parameters. If the locations are re-samples for all of the analytical parameters and they meet the cleanup objectives the locations would demonstrate that contamination has not spread past that point.

15. A report documenting the results of the required sampling/analysis results must be submitted to the Illinois EPA by June 30, 2000. This report must include:

a. identification of the reason for the sampling/analysis effort and the goals of the effort;

b. a summary in tabular form of all analytical data, including all quality assurance/quality control data;

c. a scaled drawing showing the horizontal location from which all soil samples were collected;

d. identification of the depth and vertical interval from which each sample was collected;

e. a description of the soil sampling procedures, sample preservation procedures and chain of custody procedures;

f. identification of the test method used and detection limits achieved, including sample preparation, sample dilution (if necessary) and analytical interferences;

g. copies of the final laboratory report sheets, including final sheets reporting all quality assurance/quality control data;

h. visual classification of each soil sample in accordance with ASTM D-2488;

i. a summary of all procedures used for quality assurance/quality control, including the results of these procedures; and

j. a discussion of the data, as it related to the overall goal of the sampling/analysis effort.

16. A review of the groundwater portions of the "Revised Zinc Oxide Remediation Plan" has determined that those portions can be approved with the following conditions and modifications:

a. In order to expedite the characterization of the groundwater in the vicinity of the zinc oxide spill, the installation and construction of the monitoring wells at the following locations shall occur concurrently with the soil characterization.

1) Near sample location RR7;

2) 50 feet north of RR5 in Containment #1;

3) 50 feet south of D-3;

4) 200 feet north of RR7 in Containment #2;

5) 200 feet north of RR3 in Containment #4; and

6) 200 feet north of RR5 in Containment #1.

If analytical results from the characterization activities indicate that additional well(s) are necessary in order to definitively delineate the horizontal and vertical extent of contaminants in groundwater, the facility shall submit the location of these additional well(s) prior to installation for the Illinois EPA's review and approval. The proposed monitoring well location(s) shall be identified on a scaled map that identifies the concentration and depth of contaminants in soil and groundwater.

b. Illinois EPA boring logs and well completion reports are attached and must be utilized when submitting, as required by Condition 3 below, installation and constructions details associated with the new groundwater monitoring wells to the Illinois EPA.

c. Chemetco must submit boring logs, construction diagrams, and well completion reports from the installation and development of the new monitoring wells to the Illinois EPA at the address below within thirty (30) days of the date that the installation of the well is completed. In addition, Chemetco must submit certification that plugging and abandonment of any well was carried out in accordance with the approved procedures to the Illinois EPA within thirty (30) days of the date that the well is plugged and abandoned.

Illinois Environmental Protection Agency
Planning and Reporting Section
Bureau of Land
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

d. The analytical methods for several of the parameters must be updated to reflect revised methods found in the Final Update III of U.S. EPA's Test Methods for Evaluating Solid Waste, Physical/Chemical Methods (SW-846) Third Edition (December 1996). The following list of parameters and SW-846 Methods comprise the Phase I groundwater monitoring program:

Indicator Parameters	SW-846 Method
pH	9040B
Specific Conductance	9050A
Total Organic Carbon	9060
Total Organic Halogen	9020B

Inorganic Parameters	SW-846 Method
Antimony	7040
Arsenic	7060A
Barium	7080A
Beryllium	7090
Cadmium	6010B
Chromium	6010B
Cobalt	6010B
Copper	6010B
Lead	7421
Mercury	7470A
Nickel	6010B
Selenium	6010B
Silver	6010B
Tin	7870
Vanadium	6010B
Zinc	6010B

For the purpose of comparison of analytical data to applicable 35 Ill. Adm. Code 620 groundwater quality standards, the standards as found in 35 Ill. Adm. Code 620.210 should be used until such time that a determination of groundwater classification for the zinc oxide spill area is submitted for the Illinois EPA's review and approval.

e. Clarification must be provided for Chemetco's proposal contained in Section 7.5 that states, "If any of the aforementioned constituents are present above the applicable Ill. Admin. Code Part 620 groundwater quality standards, confirmation sampling shall be initiated. If additional sampling confirms elevated concentrations, Chemetco will propose to continue to sample for those constituents for three additional quarters. A report will be submitted to the IEPA upon completion of the four quarters of monitoring." The following additional information must be submitted for the Illinois EPA's review and approval, within thirty (30) days of the date of this letter, addressing at a minimum the:

1) Time frame in which confirmation sampling will be conducted;

2) Definition of "elevated concentrations";

3) Time frame for reporting to the Illinois EPA the results of confirmation sampling; and

4) Purpose for the three additional quarters of sampling.

f. The Phase I Report must be submitted within 45 days of the receipt of data from the Phase I groundwater investigation and include at a minimum the follow:

1) A description of the geology/hydrogeology in the vicinity of the zinc oxide spill which includes:

A. qualitative assessment of porosity, texture, uniformity, lithology of all significant units;

B. Significant structural features;

C. Stratigraphic contacts between significant formations/strata;

D. Zones of high permeability, fracture of channeling in consolidated and unconsolidated deposits;

E. Perched aquifer;

F. Location of each borehole and depth to termination;

G. Depth to zone of saturation and the thickness of the unit; and

H. Interpretations of hydraulic connections between saturated zones.

2) Two (2) scaled geologic cross-sections, which contain the information required in Condition 6.a above, and clearly identifies the interval over which the wells are screened.

3) An approximately scaled map which shows the locations of borings, monitoring wells, surface features, property boundaries, roads, spill area, etc.

4) Boring logs;

5) Groundwater monitoring well completion reports;

6) Calculations and results associated with hydraulic conductivity testing;

7) Determination of classification of groundwater in accordance with the criteria found in 35 Ill. Adm. Code 620.210 and Appendix D of Attachment E of the Illinois EPA's Draft Revised RCRA Closure Guidance (November 1994).

8) Course of action based on the results of the Phase I groundwater investigation.

17. The attached form entitled RCRA Interim Status Closure and Post-Closure Care Plans General Form (LPC-PA18) must be completed and accompany all information submitted to the Illinois EPA associated with the closure activities described in this letter. As noted on this form, two copies must accompany the original of all submittals, so that the information submitted can be distributed, as necessary to Illinois EPA personnel and regional offices. However, for closure activities involving land disposal units (surface impoundments, waste piles and landfills), the Illinois EPA requests that three copies by provided, as one must be forwarded to USEPA.

18. Contaminated soil may be excavated and disposed of off-site at a properly permitted facility at any time during closure. The goal of any such effort should be to remove all soil which exceeds the established cleanup objectives.

19. All contaminated soil, water and debris generated from the closure of these units must be:

    a. Analyzed to determine if it possesses any of the characteristics of hazardous waste as set forth in 35 Ill. Adm. Code 721, Subpart C.

        1. If the waste is determined to be a hazardous waste, then it must be managed in accordance with 35 Ill. Adm. Code 722, 723, 728, 808 and 809, as well as all applicable federal requirements.

        2. If the waste is determined to be a non-hazardous waste, then it must be managed as a non-hazardous special waste in accordance with 35 Ill. Adm. Code 809.

20. Contaminated soil must be removed, as necessary, until it can be demonstrated that the remaining soil in and around the area of concern meets the established cleanup objectives. In order to meet this demonstration the excavation of the soil must continue up to the soil sampling location which meet the cleanup objectives or additional soil samples must be collected from within the excavation. If additional soil samples are collected from the excavation they must be collected for analysis from the bottom and sidewalls of the final excavation from which contaminated soil was removed. This sampling analysis effort is necessary to demonstrate that the remaining soil meets the established cleanup objectives and should comply with the following:

    a. A grid system as set forth in Section 2.6.1 of the Illinois EPA's closure plan instructions should be established over the excavation.

    b. Samples should be collected from the floor of the excavation at each grid intersection, including intersections along the perimeter of the excavation.

c. Samples should be collected 6"-12" below the ground surface at each grid intersection around the excavation perimeter. Samples should also be collected at the midpoint of the excavation wall at each grid intersection along the excavation perimeter.

d. Collection/analysis of all required samples must be in accordance with the procedures approved in this letter.

e. No random sampling shall be conducted to verify that the cleanup objectives have been met.

21. All references to the "Illinois EPA's RCRA closure plan instructions" refer to the document entitled Guidance for Preparing RCRA Closure Plans (November 1994).

22. All references to "SW-846" refer to the USEPA document entitled Test Methods for Evaluating Solid Wastes, Third Edition and any finalized updates.

23. This facility must continue to meet the applicable requirements of 35 Ill. Adm. Code 700-725 for those units identified on the latest Illinois EPA approved Part A application not approved for closure herein.

24. The approval of this partial closure plan does not relieve Chemetco of the responsibility of providing financial assurance for the remainder of the facility which is subject to closure, in accordance with 35 Ill. Adm. Code 725, Subpart H.

25. If the Illinois EPA determines that implementation of this closure plan fails to satisfy the requirements of 35 Ill. Adm. Code 725.211, the Illinois EPA reserves the right to amend the closure plan. Revisions of closure plans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.

26. A revised cost estimate and financial assurance instruments should be submitted with the closure certification documents.

27. The approval of this closure plan does not resolve this facility's violations of 35 Ill. Adm. Code 725, Subpart H (Financial Requirements). These violations will continue (and the facility will remain out of compliance) until adequate financial assurance is established or the Illinois EPA approves the certification of closure.

28. Under the provisions of 29 CFR 1910, cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a

minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.

29. Approval of this closure plan for the four (4) surface (S03) impoundments closing at this time in no way approves or disapproves the closure plan as it relates to the other units subject to RCRA closure that are not closing at this time. Prior to initiating closure activities for those units, a closure plan must be submitted to and approved by the Illinois EPA.

30. If clean closure cannot be achieved pursuant to 35 Ill. Adm. Code 725.328a)1) then a modified closure plan and a post-closure plan prepared pursuant to 35 Ill. Adm. Code Section 725.328a)2) must be submitted to the Illinois EPA for review and approval within 60 days of such a determination.

31. All waste generated as part of this project must be managed in accordance with the requirements of 35 Ill. Adm. Code 721, 722, 723, 728, 808 and 809.

32. To avoid creating another regulated storage unit during closure, it is recommended that you obtain any necessary permits for waste disposal prior to initiating excavation activities. If it is necessary to store excavated hazardous waste on-site prior to off-site disposal, do so only in containers or tanks for less than ninety (90) days. Do not create regulated waste pile units by storing the excavated hazardous waste in piles. The ninety (90) day accumulation time exemption (35 Ill. Adm. Code 722.134) only applies to containers and tanks.

33. Please be advised that the requirements of the Responsible Property Transfer Act (Public Act 85-1228) may apply to your facility due to the management of RCRA hazardous waste. In addition, please be advised that if you store or treat on-site generated hazardous waste in containers or tanks pursuant to 35 IAC 722.134, those units are subject to the closure requirements identified in 35 IAC 722.134(a)(1).

34. All hazardous wastes that result from this project are subject to annual reporting as required in 35 IAC 722.141 and shall be reported to the Illinois EPA by March 1 of the following year for wastes treated and left on-site or shipped off-site for storage, treatment and/or disposal during any calendar year. All non-hazardous special wastes that are shipped to a facility located outside the State of Illinois that result from this project are subject to annual reporting as required in Section 22.01 of the Illinois Environmental Protection Act and 35 Ill. Adm. Code 809.601(g) and shall be reported to Illinois EPA by February 1 of the following year. Additional information and appropriate report forms may be obtained from the Illinois EPA by contacting:

Administrative Compliance Unit
Division of Land Pollution Control #24
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

35. The approval of this closure plan will not: (1) resolve any of this facility's possible violations of the Illinois Environmental Protection Act and/or 35 Ill. Adm. Code, Subtitle G: Waste Disposal; or (2) prevent the USEPA or Illinois EPA from pursuing enforcement proceedings and monetary penalties as a result of the afore mentioned possible violations.

Within 35 days after the date of mailing of the Illinois EPA's final decision, the applicant may petition for a hearing before the Illinois Pollution Control Board to contest the decision of the Illinois EPA, however, the 35-day period for petitioning for a hearing may be extended for a period of time not to exceed 90 days by written notice provided to the Board from the applicant and the Illinois EPA within the 35-day initial appeal period.

Work required by this letter, your submittal(s) or the regulations may also be subject to other laws governing professional services, such as the Illinois Professional Land Surveyor Act of 1989, the Professional Engineering Practice Act of 1989, the Professional Geologist Licensing Act, and the Structural Engineering Licensing Act of 1989. This letter does not relieve anyone from compliance with these laws and the regulations adopted pursuant to these laws. All work that falls within the scope and definitions of these laws must be performed in compliance with them. The Illinois EPA may refer any discovered violation of these laws to the appropriate regulating authority.

Should you have any questions regarding the groundwater aspects of this project, please contact Terri Blake Myers at 217/524-3284; questions regarding other aspects of this project should be directed to Kevin D. Lesko at 217/524-3271.

Sincerely,

Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

KL JH
JLM:KL:bjh\2642S.WPD
TBM

Attachments: Closure Certification Form
LPC PA-18

cc: CSD Environmental Services -- Cindy S. Davis, P.G.
Illinois Attorney General's Office -- Jim Morgan
USEPA Region V -- Harriet Croke
USEPA Region V -- Pat Kuefler, DRE-9J

bcc: Collinsville Region -- Chris Cahnovsky ✓
Collinsville Region -- Gina Search
Kevin Lesko
Jerry Kuhn
GAU -- Terri Blake Myers
DLC -- Chris Perzan
DLC -- Bruce Kugler
Bureau File

CLOSURE CERTIFICATION STATEMENT
Chemetco
Closure Log C-785

To meet the requirements of 35 Ill. Adm. Code 725.215, this statement is to be completed by both a responsible officer of the owner/operator (as defined in 35 Ill. Adm. Code 702.126) and by an independent licensed professional engineer upon completion of closure. Submit one copy of the certification with original signatures and two additional copies.

The hazardous waste four (4) hazardous waste surface (S03) impoundments associated with the release of the zinc oxide at Chemetco have been closed in accordance with the specifications in the approved closure plan. A report documenting that closure has been carried out in accordance with the approved plan is attached.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name
Signature of Owner/Operator Responsible Officer — Date	Name and Title of Owner/Operator Responsible Officer
Signature of Licensed P.E. — Date	Name of Licensed P.E. and Illinois License Number
Mailing Address of P.E.:	Licensed P.E.'s Seal:

JLM:KL:bjh\2642S.WPD